

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

ERNEST FLAGG, as Next Friend of JONATHAN  
BOND, a minor; TARIS JACKSON, as Next Friend  
of ASHLEY JACKSON, a minor; and DR. BRIAN  
GREENE, as Next Friend of INDIA BOND, a minor,

Plaintiffs,

-VS-

CASE. NO.: 05-CV-74253  
HON.: GERALD E. ROSEN  
MAG. R. STEVEN WHALEN

CITY OF DETROIT, a Municipal Corporation,  
DETROIT CHIEF OF POLICE, ELLA BULLY-  
CUMMINGS, DEPUTY DETROIT POLICE CHIEF,  
CARA BEST, JOHN DOE OFFICERS 1-20, ASST.  
DEPUTY POLICE CHIEF HAROLD CURETON,  
COMMANDER CRAIG SCHWARTZ, MAYOR  
KWAME KILPATRICK, CHRISTINE BEATTY,  
Jointly and severally,

Defendants.

NORMAN A. YATOOMA (P54746)  
ROBERT S. ZAWIDEH (P43787)  
NORMAN YATOOMA & ASSOCIATES, P.C.  
Attorneys for Plaintiff  
219 Elm Street  
Birmingham, MI 48009  
(248) 642-3600  
[nya@normanyatooma.com](mailto:nya@normanyatooma.com)

---

DEFENDANT  
ELLA BULLY-CUMMINGS  
PRELIMINARY  
WITNESS LIST

DAVID MOSS (P36757)  
VINCE COLELLA (P49747)  
MOSS & COLELLA, P.C.  
Co-Counsel for Plaintiffs Ashley Jackson and  
India Bond Only  
29100 Northwestern Highway, Ste. 310  
Southfield, MI 48034  
(248) 945-0100  
(248) 945-1801  
E-mail: [dmoos@mosscolella.com](mailto:dmoos@mosscolella.com)  
[vcolella@mosscolella.com](mailto:vcolella@mosscolella.com)

KENNETH L. LEWIS (P26071)  
SAID A. TALEB (P66030)  
RANDAL M. BROWN (P70031)  
PLUNKETT COONEY  
Attorneys for Defendant Ella Bully-Cummings  
535 Griswold, Suite 2400  
Detroit, MI 48226  
(313) 983-4790  
Fax: (313) 983-4350  
E-mail: [klewis@plunkettcooney.com](mailto:klewis@plunkettcooney.com)  
E-mail: [staleb@plunkettcooney.com](mailto:staleb@plunkettcooney.com)  
E-mail: [rbrown@plunkettcooney.com](mailto:rbrown@plunkettcooney.com)

---

MAYER MORGANROTH (P17966)  
JEFFREY B. MORGANROTH (P41670)  
MORGANROTH & MORGANROTH, PLLC  
Attorneys for Defendant Christine Beatty  
3000 Town Center, Suite 1500  
Southfield, MI 48075  
(248) 355-3084  
Fax (248) 355-3107  
[jmorganroth@morganrothlaw.com](mailto:jmorganroth@morganrothlaw.com)  
[mmorganroth@morganrothlaw.com](mailto:mmorganroth@morganrothlaw.com)

---

JOHN A. SCHAPKA (P36731)  
KRYSTAL A. CRITTENDON (P49981)  
CITY OF DETROIT LAW DEPT.  
Attorneys for Defendants City of Detroit,  
Harold Cureton, Craig Schwartz & Cara Best  
660 Woodward Ave., Suite 1650  
Detroit, MI 48226-3491  
(313) 237-3018  
[critk@law.ci.detroit.mi.us](mailto:critk@law.ci.detroit.mi.us)

JAMES C. THOMAS (P23801)  
Attorney for Defendant Mayor Kwame  
Kilpatrick  
535 Griswold Street, Suite 2632  
Detroit, Michigan 48226  
(313) 963-2420  
[jthomas@plunkettcooney.com](mailto:jthomas@plunkettcooney.com)

---

DEFENDANT ELLA BULLY-CUMMINGS PRELIMINARY WITNESS LIST

---

NOW COMES Defendant, Ella Bully-Cummings, by and through her attorneys, Plunkett Cooney, and for her Preliminary Witness List states as follows:

1. Ernest Flagg
2. Jonathan Bond
3. Taris Jackson
4. Ashly Jackson
5. Dr. Brian Greene
6. India Bond
7. Family members of all individuals listed above in #1-6.
8. Any and all employees, past or present, from the City of Detroit, including but not limited to:
  - a. Records custodian
  - b. Ella Bully-Cummings
  - c. Kwame M. Kilpatrick

- d. Christine Beatty
  - e. Cara Best
  - f. Harold Cureton
  - g. Craig Schwartz
  - h. Billy Jackson
9. Custodian of Records of the following:
- a. City of Detroit Mayor Office;
  - b. City of Detroit Human Resources Department;
  - c. City of Detroit Police Department;
  - d. Wayne County Medical Examiner's Office;
  - e. Wayne County Prosecutor's Office;
  - f. Wayne County Sheriff's Department;
  - g. Michigan State Police;
  - h. Michigan Attorney General's Office;
  - i. Michigan Department of Corrections;
  - j. Detroit Receiving Hospital;
  - k. St. John Riverview Hospital;
  - l. Velocita Wireless f/k/a Skytel Communications;
  - m. Sprint/Nextel f/k/a Nextel Communications.
10. Any witnesses listed on any parties witness list filed in this matter.
11. All rebuttal witnesses.
12. Defendant Ella Bully-Cummings reserves the right to add witnesses as discovery progresses in this action.

13. Defendant Ella Bully-Cummings reserves the right to amend her witness list to correct any typographical, spelling, clerical, and identification error, which may be present and are later discovered.

PLUNKETT COONEY

By: s/Randal M. Brown  
KENNETH L. LEWIS (P26071)  
SAID A. TALEB (P66030)  
RANDAL M. BROWN (P70031)  
Attorneys for Defendant Ella Bully-Cummings  
535 Griswold, Ste. 2400  
Detroit, MI 48226  
(313) 983-4790  
(313) 983-4350 - Fax  
E-mail: [klewis@plunkettcooney.com](mailto:klewis@plunkettcooney.com)  
[staleb@plunkettcooney.com](mailto:staleb@plunkettcooney.com)  
[rbrown@plunkettcooney.com](mailto:rbrown@plunkettcooney.com)

Dated: October 17, 2008

CERTIFICATE OF SERVICE

Randal M. Brown, attorney with the law firm of PLUNKETT COONEY, being first duly sworn, deposes and says that on the 17th day of October 2008, he caused a copy of this document to be served upon all parties of record, and that such service was made electronically upon each counsel of record so registered with the United States District Court and via U.S. Mail to any counsel not registered to receive electronic copies from the court, by enclosing same in a sealed envelope with first class postage fully prepaid, addressed to the above, and depositing said envelope and its contents in a receptacle for the US Mail.

PLUNKETT COONEY

By: s/Randal M. Brown  
KENNETH L. LEWIS (P26071)  
SAID A. TALEB (P66030)  
RANDAL M. BROWN (P70031)  
Attorneys for Defendant Ella Bully-Cummings  
535 Griswold, Ste. 2400  
Detroit, MI 48226  
(313) 983-4790  
(313) 983-4350 - Fax  
E-mail: [klewis@plunkettcooney.com](mailto:klewis@plunkettcooney.com)  
[staleb@plunkettcooney.com](mailto:staleb@plunkettcooney.com)  
[rbrown@plunkettcooney.com](mailto:rbrown@plunkettcooney.com)

Dated: October 17, 2008

Detroit.00396.81396.1338615-1